U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

April 13, 2022

VIA ECF
Hon. Jesse M. Furman
United States District Judge
United States District Court
40 Foley Square, Room 2202
New York, NY 10007

      Re: *Manuel Ignacio Guzman Merejo v. Mayorkas, et al.*, 21 Civ. 10418 (JMF)

Dear Judge Furman:

      This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services ("USCIS") to reopen and approve his Application to Register Permanent Residence or Adjust Status (Form I-485). On behalf of the government, I write respectfully to request an on-consent extension of time of thirty-one days to respond to the complaint (*i.e.*, from April 15, 2022 to May 16, 2022). I also respectfully request that the initial conference presently scheduled for May 2, 2022, be adjourned until the week of May 30 or thereafter.

      I respectfully request the extension because the plaintiff's file took longer than anticipated to reach the USCIS office responsible for the adjudication. USCIS is still in the process of reviewing the file and determining next steps. This is the government's second request for an extension of the deadline to respond to the complaint and to adjourn the initial conference. Plaintiff consents to these requests.

      I thank the Court for its consideration of this letter.

Application GRANTED. Defendant's deadline to respond is May 16, 2022. The initial pretrial conference scheduled for May 2, 2022, is ADJOURNED to **June 2, 2022 at 4:30 p.m.** The Clerk of Court is directed to terminate ECF No. 9. SO ORDERED.

April 13, 2022

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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cc: Counsel of record (via ECF)